

Preliminary draft review of JBLM Permit for reissuance

NPDES Permit for MS4 discharges to Joint Base Lewis-McChord (JBLM)

EPA requested for review and comment from Washington Department of Ecology (Ecology) on Preliminary Draft Permits and Fact Sheet sent on June 21, 2022 (NPDES Permit # WAS026638).

Brief Project Description and Permit Need:

EPA proposes to reissue an NPDES permit for the JBLM. The permit places conditions on the discharge of pollutants from the facility to waters of the United States. To ensure the protection of water quality and human health, the permits place limits on the types and amounts of pollutants that can be discharged from the facilities.

Ecology Comments on Fact Sheets and Permits

1. No condition may be made less stringent.
2. Permit must retain the proposed thresholds, definitions, and minimum requirements for new and redevelopment and construction sites that are equivalent to Appendix 1 of the 2019 Western WA Phase I and II Municipal Stormwater Permits and the 2019 Stormwater Management Manual for Western Washington (SWMMWW).
3. Permit should require catch basin inspections every two years to align with the WWA Phase II Permit. JBLM may also document, through maintenance records, a reduced inspection frequency where catch basins are not exceeding the maintenance standard.
4. Permit should be clear that if JBLM chooses the option to join SAM (Monitoring option 2), that the permittee cannot change this option and must continue to participate in SAM for the permit cycle. EPA should be involved in the facilitation of option 2 selection and discussion with Ecology. Further, if this option is chosen, JBLM will need to facilitate access for monitoring sites.
5. Permit must be condition so that only non-stormwater discharges from emergency firefighting activities that do not involve PFAS as an allowable discharge and condition emergency firefighting activities that involve the use of PFAS to follow PFAS management measures.
6. Permit needs to include conditions related to PFAS management, including measures to minimize discharges of PFAS to the MS4 during emergency firefighting activities and minimize resuspension, conveyance and discharge during normal operations and during all maintenance and remediation activities.

Table 1: JBLM specific comments

Section	Page No.	Comment/Questions
	20 of 80	Permit Typo – error message for broken link
	-	Permit annual report due date does not match Fact sheet
5.8	-	Anticipated non-compliance refers to a section that is not in permit (3.5.1)